

#### Bell Atlantic 1300 I Street N.W. Suite 400W Washington, DC 20005

## EX PARTE OR LATE FILED

July 9, 1998

# @ Bell Atlantic

#### **Ex Parte**

Ms. Magalie Roman Salas Secretary Federal Communications Commission 1919 M Street, N.W. - Room 222 Washington, D.C. 20554 RECEIVED

JUL - 9 1998

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

Re: <u>CC Docket Nos 96-45</u> 8 97-160

Dear Ms. Salas:

On Tuesday, July 7, 1998, Mr. Frank Gumper and myself representing Bell Atlantic, met with Chairman Julia Johnson with the Florida Public Service Commission and a member of the Federal/ State Joint Board on Universal Service CC Docket 96-45, and Bridget Duff, Mark Long and Greg Fogleman staff members of the Florida Public Service Commission. The discussion concerned the filing made by Bell Atlantic on May 15 in the items captioned above. The attached material served as the basis for the presentation during this meeting.

Any questions on this filing should be directed to me at 202-336-7875 or at the address shown above.

Sincerely,

Attachments

cc: The Honorable Julia Johnson

B. Duff

G. Fogleman

M. Long

No. of Copies rec'd\_\_\_\_\_\_

### Bell Atlantic's Modifications to the Ad Hoc Proposal

- Bell Atlantic's modifications to Ad Hoc's Proposal were filed at the Federal Communications Commission on May 15, 1998. The Bell Atlantic proposal provides a reasonable alternative to maintain high cost funding at the existing level (\$1.7B) as opposed to alternative proposals that suggest funding above \$6B. This proposal is consistent with Bell Atlantic's policy of developing a sufficient fund that is targeted to states. In addition, these modifications address significant cost differences among states and minimize the flow between the states.
- Attachment 1 provides a summary of the modified federal Universal Service Fund by state.

The following are the highlights of Bell Atlantic's proposed modifications to the Ad Hoc platform:

- Produces a fund size of approximately \$1.7B, which includes LTS, high cost and DEM.
   Ad Hoc's high cost proposal produces a fund size of approximately \$2.3B when Long
   Term Support (LTS) is added back into their high cost results.
- This plan uses a statewide weighted average of 50% actual cost and 50% forward-looking cost (a combined HAI 5.0a and BCPM 3.1).
  - Use of any one proxy model carries a significant risk of over-estimating or underestimating the amount of high-cost support that is needed. (Attachment 4)
  - Averaging of the proxy models and combining with actual costs results in no one proxy model weighted more than 25% and smoothes out the variances between models.
  - Calculating statewide costs further mitigates the large variances associated with smaller geographical areas.
  - In contrast, the Ad Hoc proposal now uses the latest Hatfield Model (HAI 5.0a), which tends to underestimate forward-looking costs.
- Incorporates the current threshold cost benchmark of 115% of the nationwide average cost to determine today's high cost fund to recover all costs above the benchmark.. Revenues vary depending upon state pricing policies, while costs remain relatively stable. As such, the benchmark should be based on statewide average costs and not revenues.
- The plan provides for different transition plans for rural and non-rural companies.
  - Non-rural companies are defined as operating companies with greater than 100K lines at the statewide level and/or companies having 1 million or more lines at the holding company level.
  - The change in universal service funding for non-rural companies is phased in over three years. Current funding levels are not maintained indefinitely.

- Rural companies support continues at current levels for at least three years. The FCC will evaluate rural companies in a separate proceeding.
- The Bell Atlantic modifications will keep insular, high cost areas such as Alaska, Hawaii, Guam, Puerto Rico, Malaysia, and the Virgin Islands at current funding levels. The basis for this decision is that forward-looking models either do not calculate costs for these areas or have not yet incorporated the costs associated with all of their operating companies.

Bell Atlantic's modifications to Ad Hoc's Proposal provide the following benefits:

- Keeps the fund to a sufficient and manageable size, and would not place an excessive burden on ratepayers or cause massive revenue shifts.
- Better targets high-cost states.
- Maintains federal/state partnership.
- Provides for a transition to allow policymakers and companies to adjust.
- Creates a simple plan that can be implemented by January 1999.

AL \$39,274,660 \$25,386,668.98 (\$13,887,99) AR \$70,701,192 \$95,034.805.20 \$24,333,613 AZ \$28,723,088 \$10,189,632.00 (\$18,533,976 CA \$55,285,308 \$30,822,924.00 (\$24,462,346) CO \$45,893,436 \$31,379,680.00 (\$4,820,352) CT \$1,399,680 \$13,399,680.00 \$3. DC \$0 \$90,000 \$3.  FL \$30 \$0,000 \$3.  FL \$34,235,140 \$16,963,092.00 (\$7,727,248) GA \$72,279,888 \$49,460,556.00 (\$22,819,332) HI \$987,516 \$897,516 \$897,516.00 \$3. IA \$27,500,136 \$27,090,888.80 \$1,596,156 ID \$28,936,632 \$27,742,555.92 (\$61,623,746) IL \$21,584,928 \$19,964,884.00 (\$1,623,746) IL \$21,584,928 \$19,964,884.00 (\$1,623,746) IL \$21,584,928 \$19,964,884.00 (\$1,623,746) IL \$21,584,928 \$19,964,884.00 (\$1,623,746) IL \$21,584,928 \$15,593,884.00 (\$2,575,274,855.92 (\$61,623,746) IL \$21,574,946 \$22,646,870.00 (\$2,575,274,856.94) IL \$21,575,944,950.00 (\$2,575,274,856.94) IL \$21,575,944,950.00 (\$2,675,274,856.94) IL \$21,575,944,950.00 (\$2,675,274,956.94) IL \$21,570,944,950.00 (\$2,675,274,956.94) IL \$21,570,944,944,957.00 (\$2,685,974,956.94) IL \$21,570,944,944,957.00 (\$2,685,974,956.94) IL \$21,570,944,944,957.00 (\$2,685,974,956.94) IL \$21,570,944,944,957.00 (\$2,685,974,984.94) IL \$21,584,944,957.00 (\$2,685,974,984.94) IL \$21,584,				
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KY   \$25.611.804   \$43.266.057.12   \$17.654.253     LA   \$67.614.840   \$65.039.584.00   \$(\$2.575.294     MA   \$417.600   \$417.600   \$17.600.00     MID   \$588.636   \$588.636.00   \$35.000     ME   \$16.551.732   \$34.744.957.02   \$18.193.223     MI   \$33.670.200   \$29.644.908.00   \$44.052.297     MIN   \$33.414.656   \$33.343.980.00   \$4.070.676     MO   \$80.440.560   \$28.167.648.00   \$(\$2.272.913     MS   \$28.165.488   \$110.906.173.71   \$73.740.656     MT   \$44.155.066   \$67.481.716.05   \$633.326.644     NC   \$40.577.496   \$22.666.872.00   \$(\$17.910.62     ND   \$21.197.016   \$41.029.121.16   \$19.832.10     NE   \$19.706.664   \$44.781.344.10   \$25.746.88     NH   \$9.046.716   \$8.177.904.00   \$866.81     NJ   \$33.282.276   \$1.153.296.00   \$2.128.98     NM   \$33.282.276   \$1.153.296.00   \$2.128.98     NM   \$33.282.276   \$1.153.296.00   \$2.128.98     NM   \$33.282.276   \$1.153.296.00   \$2.128.98     NV   \$8.859.732   \$37.675.524.00   \$1.184.20     NV   \$8.859.732   \$37.675.524.00   \$1.184.20     NY   \$37.931.772   \$24.083.412.00   \$13.848.36     OH   \$14.766.612   \$14.766.612.00   \$1.184.20     OH   \$14.566.612   \$14.766.612.00   \$1.184.20     OR   \$37.091.748   \$34.728.912.00   \$2.362.83     PA   \$25.552.656   \$15.280.380.00   \$10.272.27     PR   \$145.852.320   \$14.5852.320.00   \$3.130.57     OR   \$37.091.748   \$34.728.912.00   \$2.362.83     SD   \$16.806.792   \$44.630.724.15   \$27.823.83     SD   \$16.806.792   \$44.630.724.15   \$27.823.83     SD   \$16.806.792   \$44.630.724.15   \$27.823.93     VA   \$13.471.552   \$8.493.012.00   \$3.848.36     VI   \$11.843.472   \$27.706.632.00   \$3.130.57     WA   \$34.349.372   \$17.281.52.00   \$3.265.27     WA   \$31.715.152   \$8.493.012.00   \$3.4575.60     VI   \$11.843.472   \$27.791.154.72   \$15.947.66     WA   \$43.494.372   \$17.281.152.00   \$3.4575.60     WV   \$21.358.524   \$29.272.605.21   \$7.914.00     St. DC & PR   \$1.702.569.552   \$1.713.045.361   \$10.475.80     MCR   \$4.910.796   \$4.910.796   \$4.910.796   \$1.106.994     MCR   \$4.910.796   \$4.910.796   \$4.910.796   \$1.006.994     MCR				
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NH \$9.046.716 \$8.177.904.00 (\$868.81:  NJ \$3.282.276 \$1.153.296.00 (\$2.128.98)  NM \$35.243.244 \$37.201.343.40 \$1.586.09  NV \$8.659.732 \$7.675.524.00 (\$1.184.20)  NY \$37.931.772 \$24.083.412.00 (\$13.848.36)  OH \$14.766.612 \$14.766.612.00 \$313.848.36  OH \$14.766.612 \$14.766.612.00 \$313.848.36  OK \$59.899.752 \$45.769.176.00 (\$14.130.57)  OR \$37.091.748 \$34.728.912.00 (\$2.362.83)  PA \$25.552.666 \$15.280.380.00 (\$10.272.27)  PR \$145.852.320 \$145.852.320.00 \$3				
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NIM \$35,243,244 \$37,201,343,40 \$1,958,09  NV \$8,859,732 \$7,675,524,00 (\$1,184,20)  NY \$37,931,772 \$24,083,412,00 (\$13,848,36)  OH \$14,766,612 \$14,766,612.00 \$1  OK \$59,899,752 \$45,769,176,00 (\$14,130,57)  OR \$37,091,748 \$34,728,912,00 (\$2,362,83)  PA \$25,552,656 \$15,280,380,00 (\$10,272,27)  PR \$145,852,320 \$145,852,320,00 \$10,272,27  PR \$145,852,320 \$145,852,320,00 \$3  SC \$45,209,328 \$35,665,489,62 (\$9,543,83)  SD \$16,806,792 \$44,630,724,15 \$27,823,93  TN \$27,766,632 \$27,766,632,00 \$3  TX \$124,215,300 \$91,355,504,00 (\$32,855,79)  UT \$8,403,012 \$8,403,012,00 \$3  VA \$13,671,552 \$8,995,884,00 (\$4,675,66)  VT \$11,843,472 \$27,791,154,72 \$15,947,68  WA \$43,494,372 \$17,281,152,00 (\$26,213,22  WI \$51,445,152 \$45,912,648,00 (\$5,532,50)  WY \$21,184,260 \$64,393,745,31 \$43,209,48  WY \$21,184,260 \$64,393,745,31 \$43,209,48  St, DC & PR \$1,702,569,552 \$1,713,045,361 \$10,475,80  GU \$1,065,924 \$1,065,924 \$1,065,924 \$5				
NV \$8,659,732 \$7,675,524.00 (\$1,184,20 NY \$37,931,772 \$24,083,412.00 (\$13,848.36 OH \$14,766,612 \$14,766,612.00 \$314,766,612 \$14,766,612.00 \$314,766,612 \$14,766,612.00 \$314,766,612.00 \$37,091,748 \$34,728,912.00 (\$14,130,57 OR \$37,091,748 \$34,728,912.00 (\$2,362,83 PA \$25,552,656 \$15,280,380.00 (\$10,272,27 PR \$145,852,320 \$145,852,320.00 \$30.00 \$				
NY \$37,931,772 \$24,083,412.00 (\$13,848.36) OH \$14,766.612 \$14,766.612.00 \$3 OK \$59,899,752 \$45,769,176.00 (\$14,130,57) OR \$37,091,748 \$34,728,912.00 (\$2,362,83) PA \$25,552,656 \$15,280,380.00 (\$10,272,27) PR \$145,852,320 \$145,852,320.00 \$3 RI \$0 \$0.00 \$3 SC \$45,209,328 \$35,665,489,62 (\$9,543,83) SD \$16,806,792 \$44,630,724,15 \$27,823,93 TN \$27,766,632 \$27,766,632.00 \$3 TX \$124,215,300 \$91,359,504.00 (\$32,855,79) UT \$8,403,012 \$8,403,012.00 \$3 VA \$13,671,552 \$8,995,884.00 (\$4,675,66) VT \$11,843,472 \$27,791,154,72 \$15,947,68 WA \$43,494,372 \$17,281,152,00 (\$26,213,22) WI \$51,445,152 \$45,912,648,00 (\$55,532,50) WV \$21,184,260 \$64,393,745,31 \$43,209,48 WY \$21,358,524 \$29,272,605,21 \$7,914,08 St, DC & PR \$1,702,569,552 \$1,713,045,361 \$10,475,80				
OH         \$14,766,612         \$14,766,612.00         \$3           OK         \$59,899,752         \$45,769,176.00         (\$14,130,57           OR         \$37,091,748         \$34,728,912.00         (\$2,362,83           PA         \$25,552,656         \$15,280,380.00         (\$10,272,27           PR         \$145,852,320         \$145,852,320.00         \$           RI         \$0         \$0.00         \$           SC         \$45,209,328         \$35,665,489,62         (\$9,543,83           SD         \$16,806,792         \$44,630,724,15         \$27,823,93           TN         \$27,766,632         \$27,766,632.00         \$           TX         \$124,215,300         \$91,359,504,00         (\$32,855,79           UT         \$8,403,012         \$8,403,012.00         \$           VA         \$13,671,552         \$8,995,884.00         (\$4,675,66           VT         \$11,843,472         \$27,791,154.72         \$15,947,68           WA         \$43,494,372         \$17,281,152,00         (\$26,213,22           WI         \$51,445,152         \$45,912,648,00         (\$5,532,50           WV         \$21,184,260         \$64,393,745,31         \$43,209,48           WY         \$21,358,524 </td <td></td> <td></td> <td></td> <td></td>				
OK         \$59,899,752         \$45,769,176.00         (\$14,130,57)           OR         \$37,091,748         \$34,728,912.00         (\$2,362,83)           PA         \$25,552,656         \$15,280,380.00         (\$10,272,27)           PR         \$145,852,320         \$145,852,320.00         \$           RI         \$0         \$0.00         \$           SC         \$45,209,328         \$35,665,489,62         (\$9,543,83           SD         \$16,806,792         \$44,630,724,15         \$27,823,93           TN         \$27,766,632         \$27,766,632.00         \$           TX         \$124,215,300         \$91,359,504.00         (\$32,855,79           UT         \$8,403,012         \$8,403,012.00         \$           VA         \$13,671,552         \$8,995,884.00         (\$4,675,66           VT         \$11,843,472         \$27,791,154.72         \$15,947,68           WA         \$43,494,372         \$17,281,152.00         (\$26,213,22           WI         \$51,445,152         \$45,912,648.00         (\$5,532,50           WV         \$21,184,260         \$64,393,745,31         \$43,209,48           WY         \$21,358,524         \$29,272,605,21         \$7,914,08           St, DC & PR				
OR         \$37.091.748         \$34.728.912.00         (\$2.362.83           PA         \$25.552.656         \$15.280.380.00         (\$10.272.27           PR         \$145.852.320         \$145.852.320.00         \$           RI         \$0         \$0.00         \$           SC         \$45.209.328         \$35.665.489.62         (\$9.543.83           SD         \$16.806.792         \$44.630.724.15         \$27.823.93           TN         \$27.766.632         \$27.766.632.00         \$           TX         \$124.215.300         \$91.359.504.00         (\$32.855.79           UT         \$8.403.012         \$8.403.012.00         \$           VA         \$13.671.552         \$8.995.884.00         (\$4.675.66           VT         \$11.843.472         \$27.791.154.72         \$15.947.68           WA         \$43.494.372         \$17.281.152.00         (\$26.213.22           WI         \$51.445.152         \$45.912.648.00         (\$5.532.50           WV         \$21.184.260         \$64.393.745.31         \$43.209.48           WY         \$21.358.524         \$29.272.605.21         \$7.914.08           St. DC & PR         \$1.702.569.552         \$1,713.045,361         \$10.475.80           GU				\$0
PA         \$25,552,656         \$15,280,380.00         (\$10,272,27           PR         \$145,852,320         \$145,852,320.00         \$           RI         \$0         \$0.00         \$           SC         \$45,209,328         \$35,665,489,62         (\$9,543,83           SD         \$16,806,792         \$44,630,724,15         \$27,823,93           TN         \$27,766,632         \$27,766,632.00         \$           TX         \$124,215,300         \$91,359,504.00         (\$32,855,79           UT         \$8,403,012         \$8,403,012.00         \$           VA         \$13,671,552         \$8,995,884.00         (\$4,675,66           VT         \$11,843,472         \$27,791,154,72         \$15,947,68           WA         \$43,494,372         \$17,281,152.00         (\$26,213,22           WI         \$51,445,152         \$45,912,648.00         (\$5,532,50           WV         \$21,184,260         \$64,393,745,31         \$43,209,48           WY         \$21,358,524         \$29,272,605,21         \$7,914,08           St, DC & PR         \$1,702,569,552         \$1,713,045,361         \$10,475,80           MCR         \$4,910,796         \$4,910,796         \$4,910,796         \$4,910,796				
PR \$145,852,320 \$145,852,320.00 \$  RI \$0 \$0.00 \$0.00 \$  SC \$45,209,328 \$35,665,489,62 (\$9,543,83 \$  SD \$16,806,792 \$44,630,724,15 \$27,823,93 \$  TN \$27,766,632 \$27,766,632.00 \$  TX \$124,215,300 \$91,359,504,00 (\$32,855,79 \$  UT \$8,403,012 \$8,403,012,00 \$  VA \$13,671,552 \$8,995,884,00 (\$4,675,66 \$  VT \$11,843,472 \$27,791,154,72 \$15,947,68 \$  WA \$43,494,372 \$17,281,152,00 (\$26,213,22 \$  WI \$51,445,152 \$45,912,648,00 (\$5,532,50 \$  WV \$21,184,260 \$64,393,745,31 \$43,209,48 \$  WY \$21,358,524 \$29,272,605,21 \$7,914,08 \$  St. DC & PR \$1,702,569,552 \$1,713,045,361 \$10,475,80 \$  GU \$1,065,924 \$1,065,924 \$  MCR \$4,910,796 \$4,910,796 \$				
RI SO \$0.00 \$0.00 \$  SC \$45,209.328 \$35.665,489.62 (\$9.543.83  SD \$16.806,792 \$44,630,724.15 \$27.823.93  TN \$27,766.632 \$27.766.632.00 \$3  TX \$124,215.300 \$91,359.504.00 (\$32.855.79  UT \$8,403.012 \$8,403.012.00 \$  VA \$13,671.552 \$8,995,884.00 (\$4.675,66  VT \$11,843,472 \$27,791,154.72 \$15,947,68  WA \$43,494.372 \$17.281,152.00 (\$26.213.22  WI \$51.445,152 \$45,912,648.00 (\$5.532.50  WV \$21.184,260 \$64,393,745.31 \$43.209,48  WY \$21.358,524 \$29.272,605.21 \$7,914,08  St. DC & PR \$1,702.569,552 \$1,713,045,361 \$10,475,80  GU \$1,065,924 \$1,065,924 \$3				
SC         \$45,209,328         \$35,665,489.62         (\$9,543,83           SD         \$16,806,792         \$44,630,724.15         \$27,823,93           TN         \$27,766,632         \$27,766,632.00         \$           TX         \$124,215,300         \$91,359,504.00         (\$32,855,79           UT         \$8,403,012         \$8,403,012.00         \$           VA         \$13,671,552         \$8,995,884.00         (\$4,675,66           VT         \$11,843,472         \$27,791,154.72         \$15,947,68           WA         \$43,494,372         \$17,281,152.00         (\$26,213,22           WI         \$51,445,152         \$45,912,648.00         (\$5,532,50           WV         \$21,184,260         \$64,393,745,31         \$43,209,48           WY         \$21,358,524         \$29,272,605,21         \$7,914,08           St. DC & PR         \$1,702,569,552         \$1,713,045,361         \$10,475,80           GU         \$1,065,924         \$1,065,924         \$3,4910,796         \$4,910,796				
SD         \$16.806,792         \$44,630,724.15         \$27,823,93           TN         \$27,766,632         \$27,766,632.00         \$           TX         \$124,215.300         \$91,359,504.00         (\$32,855,79           UT         \$8,403,012         \$8,403,012.00         \$           VA         \$13,671,552         \$8,995,884.00         (\$4,675,66           VT         \$11,843,472         \$27,791,154.72         \$15,947,68           WA         \$43,494,372         \$17,281,152.00         (\$26,213,22           WI         \$51,445,152         \$45,912,648.00         (\$5,532,50           WV         \$21,184,260         \$64,393,745.31         \$43,209,48           WY         \$21,358,524         \$29,272,605.21         \$7,914,08           St. DC & PR         \$1,702,569,552         \$1,713,045,361         \$10,475,80           GU         \$1,065,924         \$1,065,924         \$1,065,924         \$3,4910,796           MCR         \$4,910,796         \$4,910,796         \$4,910,796         \$4,910,796				
TN \$27,766,632 \$27,766,632.00 \$ TX \$124,215,300 \$91,359,504.00 (\$32,855,79 UT \$8,403,012 \$8,403,012.00 \$ VA \$13,671,552 \$8,995,884.00 (\$4,675,66 VT \$11,843,472 \$27,791,154,72 \$15,947,68 WA \$43,494,372 \$17,281,152,00 (\$26,213,22 WI \$51,445,152 \$45,912,648.00 (\$5,532,50 WV \$21,184,260 \$64,393,745,31 \$43,209,48 WY \$21,358,524 \$29,272,605,21 \$7,914,08  St. DC & PR \$1,702,569,552 \$1,713,045,361 \$10,475,80  GU \$1,065,924 \$1,065,924 \$2,005,924 \$3				
TX \$124,215,300 \$91,359,504,00 (\$32,855,79) UT \$8,403,012 \$8,403,012.00 \$\$ VA \$13,671,552 \$8,995,884,00 (\$4,675,66) VT \$11,843,472 \$27,791,154,72 \$15,947,68 WA \$43,494,372 \$17,281,152,00 (\$26,213,22) WI \$51,445,152 \$45,912,648,00 (\$5,532,50) WV \$21,184,260 \$64,393,745,31 \$43,209,48 WY \$21,358,524 \$29,272,605,21 \$7,914,08  St. DC & PR \$1,702,569,552 \$1,713,045,361 \$10,475,80  GU \$1,065,924 \$1,065,924 \$2,005,924 \$3				
UT \$8.403.012 \$8.403.012.00 \$\$  VA \$13.671.552 \$8.995.884.00 (\$4.675.66  VT \$11.843.472 \$27.791.154.72 \$15.947.68  WA \$43.494.372 \$17.281.152.00 (\$26.213.22  WI \$51.445.152 \$45.912.648.00 (\$5.532.50  WV \$21.184.260 \$64.393.745.31 \$43.209.48  WY \$21.358.524 \$29.272.605.21 \$7.914.08  St. DC & PR \$1.702.569.552 \$1.713.045,361 \$10.475.80  GU \$1.065.924 \$1.065.924 \$2.065.924 \$3.065.924  MCR \$4.910.796 \$4.910.796			42/// 00/002:00	
VA         \$13.671.552         \$8.995.884.00         (\$4.675,66           VT         \$11.843.472         \$27.791.154.72         \$15.947.68           WA         \$43.494.372         \$17.281.152.00         (\$26.213.22           WI         \$51.445.152         \$45.912.648.00         (\$5.532.50           WV         \$21.184.260         \$64.393.745.31         \$43.209.48           WY         \$21.358.524         \$29.272.605.21         \$7.914.08           St. DC & PR         \$1.702.569.552         \$1,713.045,361         \$10.475.80           GU         \$1.065.924         \$1.065.924         \$1.065.924         \$4.910.796         \$4.9		··		
VT         \$11,843,472         \$27,791,154.72         \$15,947,68           WA         \$43,494,372         \$17,281,152.00         (\$26,213,22           WI         \$51,445,152         \$45,912,648,00         (\$5,532,50           WV         \$21,184,260         \$64,393,745,31         \$43,209,48           WY         \$21,358,524         \$29,272,605,21         \$7,914,08           St, DC & PR         \$1,702,569,552         \$1,713,045,361         \$10,475,80           GU         \$1,065,924         \$1,065,924         \$3,065,924         \$3,065,924           MCR         \$4,910,796         \$4,910,796         \$4,910,796         \$3,000,000				
WA         \$43,494,372         \$17,281,152.00         (\$26,213,22           WI         \$51,445,152         \$45,912,648.00         (\$5,532,50           WV         \$21,184,260         \$64,393,745.31         \$43,209,48           WY         \$21,358,524         \$29,272,605.21         \$7,914,08           St, DC & PR         \$1,702,569,552         \$1,713,045,361         \$10,475,80           GU         \$1,065,924         \$1,065,924         \$3,065,				<u> </u>
WI         \$51,445,152         \$45,912,648,00         (\$5,532,50           WV         \$21,184,260         \$64,393,745,31         \$43,209,48           WY         \$21,358,524         \$29,272,605,21         \$7,914,08           St, DC & PR         \$1,702,569,552         \$1,713,045,361         \$10,475,80           GU         \$1,065,924         \$1,065,924         \$3,065,924				
WV         \$21.184,260         \$64,393,745.31         \$43,209,48           WY         \$21.358,524         \$29.272,605.21         \$7,914,08           St, DC & PR         \$1.702,569,552         \$1,713,045,361         \$10,475,80           GU         \$1,065,924         \$1,065,924         \$3,065,924 </td <td></td> <td></td> <td></td> <td></td>				
WY         \$21,358,524         \$29,272,605,21         \$7,914,08           St, DC & PR         \$1,702,569,552         \$1,713,045,361         \$10,475,80           GU         \$1,065,924         \$1,065,924         \$           MCR         \$4,910,796         \$4,910,796         \$				
St. DC & PR \$1.702.569.552 \$1,713,045,361 \$10,475,80  GU \$1,065,924 \$1,065,924 \$ MCR \$4,910,796 \$4,910,796 \$				
GU \$1,065,924 \$1,065,924 \$ MCR \$4,910,796 \$4,910,796 \$	WY	\$21,358,524	<b>\$29,272,605</b> .21	\$7,914,081
GU \$1,065,924 \$1,065,924 \$ MCR \$4,910,796 \$4,910,796 \$	St, DC & PR	\$1.702.569.552	\$1,713,045,361	\$10,475,809
MCR \$4,910,796 \$4,910,796 \$				
MCR \$4,910,796 \$4,910,796 \$				
		\$1,065,924	\$1,065,924	\$0
VI \$16,245,684 \$16,245,684 \$	MCR	\$4,910,796	\$4,910,796	\$0
	VI	\$16,245,684	\$16,245,684	\$0
Total \$1,724,791,956 \$1,735,267,765 \$10,475,80	Total	61 704 701 054	61 705 047 746	\$10,475,809

A	Б	C	0	E	F	G	Н
	18	AC Loops & Sub	alety	Calc. New Str	ntewide USF Sub.		
		Current		COLO. ITOW OIL			
1		Statewide			New Statewide		
]			Hold Harmless	50% Comb &	USF using 50%		
1	Sum of USF		for Small	50% Actual	Comb & 50%		Change over 3
, ,	Loops	(USF, DEM, LTS)	Companies	AMC	Actual AMC	Proposed Support	Years
AK	377,416	\$62,597,604	\$62,597,604	\$36.50	\$62,597,604.00	\$62,597,604	\$0
AL	2.312.101	\$39,274,860	\$22,682,400	\$36.22	\$25,386,868.98	\$25,386,869	(\$13.887.991)
AR	1,318,280	\$70,701,192	\$36,147,528	\$43.01	\$95,034,805.20	\$95.034,805	\$24,333,613
AZ	2,541,549	\$28.723.608	\$10,189,632	\$32.02	\$0.00	\$10,189,632	(\$18,533,976)
CA	20,809,546	\$55,285,308	\$30.822,924	\$24.56	\$0.00	\$30.822.924	(\$24.462.384)
co	2.452.764	\$45,893,436	\$41.073.084	\$34.23	\$0.00	\$41,073,084	(\$4,820,352)
CT	2.010,578	\$1,399,680	\$1,399,680	\$30.17	\$0.00	\$1,399,680	\$0
<u>DC</u>	901,311	\$0	\$0		\$0.00	\$0	\$0
DE	507,860	\$0	\$0		\$0.00	\$0	\$0
FL	9,897,855	\$24,235,140	\$16.963.092	\$29.14	\$0.00	\$16.963.092	(\$7.272.048)
GA	4,513,317	\$72,279,888	\$49,460,556		\$0.00	\$49,460,556	(\$22.819.332)
HI	693.630	\$897,516	\$897,516		\$897.516.00 \$29.098.288.80	\$897,516 \$20,006,280	\$0 \$1,598,153
IA ID	1,539,592	\$27,500,136	\$25.868.916		\$29,090,286.80	\$29,096,289 \$22,774,256	(\$6.162,376)
<u></u>	7,714,111	\$28,936,632 \$21,584,928	\$16,425,936 \$19,964,484	\$38.94	\$22,774,255.92	\$19,964,484	(\$1,620,444)
IL IN	3,342,142	\$16,500,984	\$15,503,484		\$0.00	\$15.503.484	(\$997.500)
KS	1,523,369		\$19,303,484	\$30.62	\$42,639,098.31	\$42.639.098	
KY	1,986,504	\$25.611.804	\$11.208.288		\$43,266,057,12		\$17.654.253
LA	2,340,006		\$65,039,544		\$1,053.002.70		(\$2,575,296)
MA	4,273,186	\$417,600	\$417,600		\$0.00		
MD	3.344,003		\$588.636		\$0.00		\$0
ME	775,211		\$16.335.516		\$34,744,957.02	\$34,744,957	\$18,193,225
MI	6.028,449	\$33.670.200	\$29,644,908	\$28.34	\$0.00	\$29,644,908	(\$4,025,292)
MN	2,773,994	\$37,414,656	\$33,343,980	\$32.61	\$0.00	\$33,343,980	(\$4.070.676)
MO	3,192,721	\$50,440,560	\$28,167,648	\$34.95	\$0.00	\$28.167,648	(\$22.272.912)
MS	1,270,809				\$101,906,173,71		
MT	488.467				\$67,481,716.05		
NC NC	4,453,425				\$0.00		
ND	393,678		<del></del>		\$41,029,121.16		\$19,832,105
NE NE	958,710	<del></del>			\$44,781,344.10		
NH	770,057				\$0.00		
NM	5,894,627 862,940				\$0.00 \$37.201,343.40		
NV	1,122,489				\$0.00		
NY	12,308,488				\$0.00		
ОН	6.488,115				\$0.00		
OK	1.869.687				\$45,265,122.27		
OR	1.909,459				\$0.00		
PA	7.669,723				\$0.00		
PR	1.188.082				\$145,852,320.00		
Ri	625.327				\$0.00		
sc	2.042.697	\$45.209.328	\$28,352,84	\$36.94	\$35,665,489.60	\$35,665,490	(\$9.543.838)
SD	395,137			2 \$47.55	\$44,630,724.1	\$44,630,724	\$27.823.932
TN	3,161,39				\$0.00		
TΧ	11.286.718				\$0.00		
UT	1,022,290				\$0.00		
VA	4.166.624				\$0.0		
<u> </u>	380,28				\$27,791,154.7		
WA	3.333.124				\$0.0		
WI	3,172,890				\$0.0		
	930.41				\$64,393,745.3		
w	272.63	\$21.358.524	\$16,614,03	6 \$46.93	\$29,272,605.2	\$29,272,60	5 \$7,914,081
L 00 0 00	144 250 00	A) 700 640 66	41 000 000 00	<del> </del>	4. 2.2.2.2.2.2.2.2.2.2.2.2.2.2.2.2.2.2.2	1	
St. DC & PR	166,250,03	\$1,702,569,552	\$1,293,928,59	6 \$30.36	\$1,042,763,31	\$1,713,045,36	\$10,475,808
	<del> </del>	<del></del>	<del> </del>	<del> </del>		<del> </del>	<b>_</b>
<del> </del>	<del> </del>	61 245 2	61.045.00	<del>}</del>	1 21 24 22	1	<del></del>
GU MCR	18.83	\$1,065.924			\$1,065,92		
VI	58.31				\$4,910,79		
\ <u>\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\</u>	30,31	5 \$16.245.684	\$16,245,68	4 n/a	\$16,245.68	\$16,245,68	\$0
Total	166,327,18	\$1 724 701 05	\$1,316,151,00	0 n/o	\$1.064,985,71	8 \$1,735,267,76	\$10,475,808
10101	100,027,10	- 31,124,171,930	J 31,310,131,00	Y 11/0	31,004,900,71	u	4[ \$10,475,606

State	Increased Level of Funding
MS	\$73,740,686
WV	\$43,209,485
SD	\$27,823,932
NE	\$25,074,680
AR	<b>\$24,333,6</b> 13
MT	\$23,326,648
ND	\$19,832,105
ME	\$18,193,225
KY	\$17,654,253
VT	\$15,947,683
WY	\$7,914,081
NM	\$1,958,099
IA .	<b>\$1,598,153</b>

State	No Impact on Funding
AK	\$0
СТ	\$0
DC	\$0
DE	\$0
HI	\$0
MA	\$0
MD	\$0
ОН	\$0
PR	\$0
RI	\$0
TN	\$0
UT	\$0

## Impact Summary By State Benchmark = \$35 (115%)

<del>,</del>	,
State	Decreased Lavel of Funding
NH	(\$868,812)
IN	(\$997,500)
NV	(\$1,184,208)
IL	(\$1,620,444)
NJ	(\$2,128,980)
OR	(\$2,362,836)
LA	(\$2,575,296)
MI	(\$4,025,292)
MN	(\$4,070,676)
VA	(\$4,675,668)
CO	(\$4,820,352)
WI	(\$5,532,504)
ID	(\$6,162,376)
FL	(\$7,272,048)
SC	(\$9,543,838)
PA	(\$10,272,276)
NY	(\$13,848,360)
AL	(\$13,887,991)
OK	(\$14,130,576)
KS	(\$15,082,558)
NC	(\$17,910,624)
AZ	(\$18,533,976)
MO	(\$22,272,912)
GA	(\$22,819,332)
CA	(\$24,462,384)
WA	(\$26,213,220)
TX	(\$32,855,796)
<u> </u>	(402,000,700)

## Non-Rural Holding Companies

## 1 Million or More USAC Loops

Nationally

Holding Company Name	USAC Loops
BELL ATLANTIC	38,042,224
SOUTHWESTERN BELL	31,551,489
BELLSOUTH	22,079,006
AMERITECH	19,686,102
GTE CORPORATION	17,403,205
US WEST	15,118,481
SPRINT	7,134,587
SOUTHERN NEW ENGLAND TELEPHONE	1,990,248
ALLTEL SERVICE CORP	1,634,560
PUERTO RICO TEL CO	1,188,082

100k - 1 Million USAC Loops Nationally

11-1-11			
Holding Company Name	USAC Loops		
FRONTIER CORPORATION	976,115		
CINCINNATI BELL	941,316		
CITIZENS UTILITIES	864,563		
PACIFIC TELECOM INC	514,808		
TDS TELECOM	477,695		
CENTURY TELEPHONE	468,815		
ALIANT COMMUNICATIONS CO.	269,410		
COMMONWEALTH TEL CO	239,060		
ANCHORAGE TEL UTILITY	157,299		
NORTH STATE TEL CO	111,774		
ROSEVILLE TEL CO	103,468		
ROCK HILL TELEPHONE	101,747		

[		<del>, , , , , , , , , , , , , , , , , , , </del>	
]	Current Statewide	DCDM2 1 Com About	LIALE On Cost About
	Subsidy, Annual	BCPM 3.1 Cost Above	
State	(USF, DEM, LTS)	115% of Average	115% of Average
AK	\$62,597,604	\$0	\$0
AL	\$39,274,860	\$152,168,495	\$126,992,274
AR	\$70,701,192	\$218,950,068	\$116,228,336
AZ	\$28,723,608	\$0	\$0
CA	\$55,285,308	\$0	
CO	\$45,893,436	\$0	
CT	\$1,399,680	\$0	
DC	\$0	\$0	
DE	\$0	\$0	
FL	\$24,235,140	\$0	
GA	\$72.279,888	\$0	\$0
HI	\$897,516	\$0	
LA LA	\$27,500,136	\$214,800,159	\$111,552,492
ID ID	\$28,936,632	\$49,199,630	\$59,249,906
IL IL	\$21,584,928	\$0	\$0
IN	\$16,500,984	\$0	\$O
KS	\$57,721,656	\$75,400,422	\$112,197,939
ΚY	\$25,611,804	\$134,792,841	\$63,198,388
LA	\$67,614,840	\$0	\$0
MA	\$417,600	\$0	\$0
MD	\$588,636	\$0	\$0
ME	\$16,551,732	\$54,065,464	\$58,096,845
Mi	\$33,670,200	\$0	
MN	\$37,414,656	\$45,280,654	\$63,792,371
MO	\$50,440,560	\$113.621,889	\$71,267,931
MS	\$28,165,488	\$216,088,713	\$142,120,937
MT	\$44,155,068	\$95,530,200	\$176,197,337
NC NC	\$40,577,496	\$0	\$72,106,943
ND	\$21,197,016	\$76,698,494	\$143,408,563
NE	\$19,706,664	\$74,939,491	\$149,462,106
NH	\$9,046,716	\$0	\$0
NJ	\$3,282,276	\$0	\$0
NM	\$35,243,244	\$43,262,499	\$85,345,666
NV	\$8,859,732	\$0	\$0
NY	\$37,931,772	sc sc	\$0
OH	\$14,766,612	\$0	\$0
OK	\$59,899,752	\$151,393,528	\$119,521,033
OR	\$37,091,748	sc sc	\$0
PA	\$25,552,656	\$0	
PR	\$145,852,320	\$0	\$0
RI	SC	\$0	
SC	\$45,209,328		\$14,273,046
SD	\$16,806,792		\$138,214,018
TN	\$27,766,632	\$15,420,215	\$14,579,688
rx	\$124,215,300	<del></del>	SC
UT	\$8,403,012	\$(	
VA	\$13,671,552		
_ vi	\$11,843,472		
WA	\$43,494,372	<del></del>	
WI	\$51,445,152	<del></del>	
w	\$21,184,260		
WY	\$21,358.524		
		†	1 40,,022,730
St, DC & PR	\$1,702,569,552	\$2,114,943,093	\$2,013,160,003
	1 41,702,007,002	1 02,114,745,070	72,010,100,000

The subsidy amount for each state equals the respective proxy model's statewide cost in excess of of the model generated national average. In addition, the subsidy was calculated using each moc

## 1997 Per Capita Income

#### **National Ranking**

	States	1997
1 2		\$18,272 \$18,957
3		\$19,585
4		\$19,587
5	Montana	\$20,046
6	North Dakota	\$20,271
7	Utah	\$20,432
8	idaho	\$20,478
9	Oklahoma	\$20,556
10	THE PROPERTY OF THE PROPERTY O	\$20,657
11	Louisiana	\$20,680
12	South Carolina	\$20,755
13 14	Alabama	\$20,842
15	and the second	\$21,447
16	Arizona	\$22,078
17	Algoria	\$22,364 \$22,648
18	Tennessee	\$23,018
19	x 2002 8 (0 5 5 6 5 7 7 7	<b>\$23</b> ,102
20	North Carolina	\$23,345
21	operation of the second	\$23,401
22	Indiana	\$23,604
23	Texas	\$23,656
24	WAS WALLING	\$23,803
25	Missouri	\$24,001
26	Georgia	\$24,061
27	Kansas	\$24,379
28	Oregon	<b>\$24,3</b> 93
29	Wisconsin	\$24,475
30 31	Ohio	\$24,661
32	Florida	\$25,255 \$25,255
33	Alaska Michigan	\$25,305 \$25,560
34	Rhode Island	\$25,760
35		
36	Hawaii Pennsylvania	\$26,034 \$26,059
37	Virginia	<b>\$26,</b> 058 <b>\$26,</b> 438
38	California	\$26,570
39	Washington	<b>\$26</b> ,718
40	Nevada	\$26,791
41	Minnesota	\$26,797
42	Colorado	\$27,051
43	New Hampshire	\$28,047
44	Illinois	\$28,202
45	Maryland	\$28,969
46	Delaware	\$29,022
47	New York	\$30,752
48	Massachusetts	<b>\$3</b> 1,524
49	New Jersey	\$32,654
50 51	District of Columbia	\$35,852 \$00,000
31	Connecticut	<b>\$36</b> ,263

		6	Current Subsidy for	Difference Chalter
_		Current Subsidy	Small Companies	Difference (Delta
Holding Company	Operating Company	(note 1)	(note 2)	Year 3)
ALLTEL SERVICE CORP	ALLTEL FLORIDA INC (2)	\$5,031,132	\$0	-\$5,031,132
ALLIEL SERVICE CORP	Total Alltel Service Corp	\$5,031,132		-\$5,031,132
<u></u>	Total Affel service Corp	\$3,031,132	30	-\$5,001,152
BELLSOUTH	SOUTHERN BELL-FL (2)	\$1,600,860	so	-\$1,600,860
	Total Bellsouth	\$1,600,860	\$0	-\$1,600,860
	1			
FRONTIER CORPORATION	FRONTIER COMM OF THE SOUTH-FL	\$542,328	\$542,328	\$0
<u> </u>	Total Frontier Corporation	\$542.328	\$542,328	\$0
GTE CORPORATION	GTE FLORIDAINC (2)	\$640,056	so	-\$640,056
1	Total GTE Corporation	\$640,056		-\$640.056
	70.0.0.12 GO.IDO.G.IIO.		<u></u>	
INDIANTOWN TEL SYS	INDIANTOWN TEL SYSTEM	\$1,579,944	\$1,579,944	\$0
	Total Indiantown Tel Sys	\$1,579,944	\$1,579,944	\$0
NE FL TEL CO INC	NORTHEAST FLORIDA TEL CO INC	\$1,892,172	\$1,892,172	\$0
<u> </u>	Total Northeast Florida Tel Co	\$1,892,172	\$1,892,172	\$0
SPRINT	CENTRAL TEL CO OF FLORIDA (2)	\$0	\$0	\$0
	UNITED TEL CO OF FLORIDA (2)	\$0		\$0
	Total Sprint	\$0		
,		1		
ST. JOSEPH TELEPHONE	FLORALA TELEPHONE COMPANY-FL	\$1,149,912		\$0
	GULF TEL CO-FL	\$1,812,264		\$0
	ST JOSEPH TEL AND TELE CO	\$4,543,644		\$0
L	Total St. Joseph Telephone	\$7,505,820	\$7,505,820	\$O
ITDS TELECOM	QUINCY TEL CO-FL DIV	\$1,100,628	\$1,100,628	\$0
)	Total TDS Telecom	\$1,100,628		
		Í		
VISTA-UNITED TELECOM	VISTA-UNITED TELECOMM SYSTEMS	\$4,342,200		
	Total Vista-United Telecom	\$4,342,200	\$4,342,200	\$0
Florida Chatavida Tatal		201.00=1:00		07.07
Fiorida Statewide Total		\$24,235,140	\$16,963,092	-\$7,272,048

#### NOTES

<sup>(1) &</sup>quot;Current Subsidy" is the annualized amount for all subsidy payments contained in USAC's hico2q98 file.

<sup>(2)</sup> These operating companies fall into the categorization of "Large Company" under our "Large Company Specification 2" which classifies an operating company as being a "large company" if either (a) it is part of a holding company with 1,000,000 or more nationally and/or (b) it is part of a holding company which has 100,000 or more lines in the state.





